EXHIBIT 16

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Case 3:20-cv-06754-WHA Document 866-36 Filed 09/05/23 Page 2 of 3 HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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                 IN THE UNITED STATES DISTRICT COURT
 2
                   NORTHERN DISTRICT OF CALIFORNIA
 3
                       SAN FRANCISCO DIVISION
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 5
     GOOGLE LLC,
                                     )
                                     )
                Plaintiff,
 6
                                     ) Case No.
                                     ) 3:20-cv-06754-WHA
 7
                                     ) Related to CASE No.
     vs.
                                     ) 3:21-cv-07559-WHA
 8
     SONOS, INC.,
 9
                Defendants.
10
11
                               ---000---
12
                    Videotaped Zoom Deposition of
13
                            ALLISON ELLIOTT
14
             Highly Confidential - Attorney's Eyes Only
15
                        Friday, May 27, 2022
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     Veritext Job No.: 5251903
24
     Katy E. Schmidt
25
     RPR, RMR, CRR, CSR 13096
                                                       Page 1
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3 Q. Are you familiar with the code name Devo, 01:51 4 De-ve-ve-0. 01:51 5 A. No. I don't think so. No. 01:51 6 Q. Are you familiar with the code name Encore? 01:51 7 A. Yes. 01:51 8 Q. And what did Encore refer to? 01:51 9 A. That was a player launch. That was the launch 01:51 10 of the Plays. 01:52 11 Q. Are you familiar with the code name Sol. 01:52 12 So-07 13 A. It riags a hell, but I don't remember which 01:52 14 thing it refers to. 01:52 15 Q. What about the code name Sonar? 01:52 16 A. Yes. 01:52 17 Q. What does Sonar refer to? 01:52 18 A. That was a player launch, but I don't remember of 01:52 19 which player. 01:52 20 Q. Are you familiar with the code name Encore of 01:52 21 Enco. En-o? 01:52 22 A. Yes. Yes. 01:52 23 Q. What does doe name Sonar? 01:52 24 A. That was a spoutity—one of the important 01:52 25 Sportify launches, but I don't remember the exact scope 01:52 26 Q. What dish accede name refer to? 01:52 27 Q. What dish accede name refer to? 01:52 28 Q. What dish accede name refer to? 01:52 29 Q. What dish accede name refer to? 01:52 21 Enco. En-o? 01:52 22 A. Yes. Yes. 01:53 23 Q. What dish accede name refer to? 01:52 24 A. That was a Sportify—one of the important 01:52 25 Sportify launches, but I don't remember the exact scope 01:52 26 Q. When you say they were one of the Sportify 01:53 3 Natural scope of the order of the important 01:52 27 Q. What adout the code name farcor 01:52 28 A. Yes. That was a sportify so I can't really 01:53 3 Natural scope of the order of the important 01:52 4 A. I didn't work on Sportify so I can't really 01:53 5 even tell you what was incorporated in each Sportify 01:53 10 reclease, I don't remember that being associated with a 01:53 11 or celease, I don't remember that being associated with a 01:53 12 Q. Was there a code name for the direct playback 01:53 13 launch of Pamborn? 01:54 24 Q. Was there a code name for the direct playback 01:53 15 what it was, though, I of the many discussion of the order of the orde	1 Google Play Music was? 01:51	1 Q. And what was your role in the YouTube 01:54
4 De-v-o. 01:51 5 A. No. I don't think so. No. 01:51 6 Q. Are you familiar with the code name fancor? 01:51 7 A. Yes. 6 Using the Play.5 01:52 9 A. That was a player hunch. That was the launch 01:51 10 of the Play.5 01:52 11 C. Are you familiar with the code name so. 01:52 12 S-0-17 01:52 13 A. Trings a bell, but I don't remember which 01:52 14 thing it refers to. 01:52 15 Q. What about the code name Sonar? 01:52 16 A. Yes. 01:52 17 Q. What about the code name Sonar? 01:52 18 A. That was a player hunch, but I don't remember 01:52 19 What about the code name Sonar? 01:52 10 Q. Are you familiar with the code name Sonar? 01:52 11 A. That was a player hunch, but I don't remember 01:52 12 S-0-17 13 Q. What about the code name Sonar? 01:52 14 thing it refers to. 01:52 15 Q. What about the code name Eno or 01:52 16 A. Yes. 01:52 17 Q. What does Sonar refer to? 01:52 18 A. That was a player hunch, but I don't remember 01:52 20 Q. Are you familiar with the code name Eno or 01:52 21 Eno, En-o? 01:52 22 A. Yes. Ves. 01:52 23 Q. What did that code name refer to? 01:52 24 A. That was a Spotify one of the important 01:52 25 Spotify launches, but I don't remember the exact scope 01:52 25 Spotify launches, but I don't remember the exact scope 01:52 26 Q. When you say they were one of the Spotify 01:53 3 Launches, what were the various Spotify launches? 01:55 3 A. Yes. That was a release, a particular 01:53 5 even tell you what was incorporated in each Spotify 01:53 6 launch. 01:53 7 Q. What about the code name Iay 2? 01:53 8 A. Yes. That was a release, a particular 01:53 9 release, but I don't remember reduced the order of the important of the order of the important of the order of the important of the order of the order of the important of the order of the o	2 A. No. 01:51	2 integration with Sonos speakers? 01:54
5 A. No. I don't think so. No. 01:51	3 Q. Are you familiar with the code name Devo, 01:51	3 A. I was a partner product manager and I was 01:54
6 Q. Are you familiar with the code name Encore? 01:51 7 A. Yes. 01:51 9 A. That was a player launch. That was the launch 01:51 10 of the Play-5. 01:52 11 S. 5-47 01:52 13 A. It rings a bell, but I don't remember which 01:52 14 thing it refers to. 01:52 15 Q. What about the code name Sonar? 01:52 16 A. Yes. 01:52 17 Q. What about the code name Sonar? 01:52 18 A. That was a player launch, but I don't remember of 1:52 19 which player. 01:52 10 Q. Are you familiar with the code name Eno or 01:52 21 Eno, En-o? 01:52 22 Q. What does Sonar refer to? 01:52 23 Q. Ney ou familiar with the code name Eno or 01:52 24 A. That was a player launch, but I don't remember of 1:52 25 Spotify launches, but I don't remember the exact scope 01:52 26 Q. Are you familiar with the code name Eno or 01:52 27 Q. What about the code name Fefer ro? 01:52 28 Spotify launches, but I don't remember the exact scope 01:52 29 Q. What did that code name refer ro? 01:52 21 Inn. En-o? 01:52 22 A. Yes. 01:53 23 Jaunches, what were the various Spotify launches? 01:53 24 A. I didn't work on Spotify so I can't really 01:53 25 Spotify launches, but I don't remember the exact scope 01:52 26 Q. When you say they were one of the Spotify 01:53 27 Q. What about the code name fare ro? 01:52 28 A. Tess. 01:55 31 Jaunch for the member the exact scope 01:52 4 A. I didn't work on Spotify so I can't really 01:53 5 In trease, I don't remember and the point when I swin but a microprorated in each Spotify 01:53 5 Percelase, but I don't remember who who who who whow who whow the worked at Sonos on the 01:56 2 For the Spotify on the SMAPI integration or even if there was anyone 01:56 3 Jaunch for the member who whow how whow whow whow whow whow	4 D-e-v-o. 01:51	4 going to be working with I was going to be working 01:54
7	5 A. No. I don't think so. No. 01:51	5 with Google and Sonos to help figure out how 01:54
8 Q. And what did Encore refer to? 01:51 9 A. That was a player launch. That was the launch 01:52 11 Q. Are you familiar with the code name Sol. 01:52 12 S-0-17 (152) 13 A. It rings a bell, but I don't remember which 01:52 14 thing it refers to. 01:52 15 Q. What about the code name Sonar? 01:52 16 A. Yes. 01:52 17 Q. What does Sonar refer to? 01:52 18 A. That was a player launch, but I don't remember 01:52 19 which player. 01:52 20 Q. Are you familiar with the code name Eno or 01:52 21 Eno, En-o? 01:52 22 A. Yes. Yes. 01:52 23 Q. What did that code name refer to? 01:52 24 A. That was a spotify — one of the important 01:52 25 Spotify launches, but I don't remember the exact scope 01:52 26 Q. When you say they were one of the Spotify 01:52 27 Q. When you say they were one of the Spotify 01:52 28 A. I didn't work on Spotify sol can't really 01:53 3 hamnches, what were the various Spotify launches? 01:53 4 A. I didn't work on Spotify sol can't really 01:53 5 even tell you what was incorporated in each Spotify 01:53 10 release. I don't remember that being associated with a 01:53 11 puricular partner. 01:53 12 Q. Was there a code name for the direct playback of the produced in the produced of the prod	6 Q. Are you familiar with the code name Encore? 01:51	6 YouTube Music and Sonos and Google Play Music, both of 01:55
9	7 A. Yes. 01:51	7 which had independent SMAPI integrations, could be 01:55
9	8 Q. And what did Encore refer to? 01:51	8 combined when Google combined Google Play Music with 01:55
11 Q. Are you familiar with the code name Sol, 01:52 12 50-017 13 A. It rings a bell, but I don't remember which 01:52 14 thing it refers to. 01:52 15 Q. What about the code name Sonar? 01:52 15 Q. What about the code name Sonar? 01:52 15 A. Yes. 01:55 16 Q. Were you involved in any discussions about a 01:55 17 Q. What doos Sonar refer to? 01:52 18 A. That was a player launch, but I don't remember 01:52 19 which player. 01:52 19 direct playback integration with YouTube? 01:55 10 direct playback integration with YouTube with YouTube 01:55 10 direct playback integration with YouTube with YouTube 01:55 10 direct playback integration with YouTube 01:55 10 direct playback integration with YouTube with YouTube 01:55 10 direct playback integration with YouTube with YouTub	9 A. That was a player launch. That was the launch 01:51	9 YouTube, and we had started those conversations. 01:55
11 g. A. reyou familiar with the code name Sol, 01:52 12 S-0-17 13 A. It rings a bell, but I don't remember which 01:52 14 thing it refers to. 15 Q. What about the code name Sonn? 01:52 15 Q. What about the code name Sonn? 01:52 16 A. Yes. 17 Q. What does Sonar refer to? 01:52 18 A. That was a player launch, but I don't remember 01:52 19 which player. 10:52 20 Q. Are you familiar with the code name Eno or 01:52 21 Eno, En-n-o? 11:52 22 A. Yes. 10:52 23 Q. What did that code name refer to? 24 A. That was a splorify — one of the important 01:52 25 Spotify launches, but I don't remember the exact scope 01:52 25 Spotify launches, but I don't remember the exact scope 01:52 26 Q. When you say they were one of the Spotify 01:53 3 Launches, what were the various Spotify launches? 01:53 5 even tell you what was incorporated in each Spotify 01:53 5 even tell you what was incorporated in each Spotify 01:53 5 even tell you what was incorporated in each Spotify 01:53 9 release, but I don't remember of the direct playback 01:53 10 release. I don't remember that being associated with a 01:53 10 release. I don't remember that being associated with a 01:53 10 g. Who would know that information? 01:56 11 particular partner. 11 particu	10 of the Play:5. 01:52	10 However, that combination event was delayed on Google's 01:55
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